

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
Jesus Guadalupe Covarrubias) Case No.)
)
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)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 25, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 United States Code,
Section 922 (g)(1)

Possession of a Firearm and Ammunition by a Prohibited Person (convicted of a crime punishable by imprisonment for a term exceeding one year)

This criminal complaint is based on these facts:

See Attached Sheet...

Continued on the attached sheet.

/s/ Darren Johnson

Complainant's signature

Submitted by reliable electronic
means per Fed.R.Crim.P. 4.1, Darren Johnson
sworn to and signature attested
telephonically on August 30, 2021,
at Laredo, Texas.

Diana Song Quiroga
DIANA SONG QUIROGA
UNITED STATES MAGISTRATE JUDGE

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UNITED STATES MAGISTRATE JUDGE

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ATTACHMENT A
(JESUS GERARDO COVARUBIAS)

On or about July 25, 2014, Jesus Guadalupe COVARRUBIAS (COVARUBIAS) was sentenced to a two-year sentence, probated for a term of five years, for Theft, a state jail felony level crime under the Texas Penal Code, punishable by imprisonment for more than one year, in Cause No. 2011-CRT-000022-D1, by the 49th District Court in Webb County, Texas.

On or about November 15, 2020, agents from the ATF Laredo Office had verbally and in writing warned COVARRUBIAS that as a convicted felon, he is prohibited from “receiving or possessing a firearm or ammunition because of [his] prior conviction or other federal firearms disability...”

On or about July 22, 2021, a Webb County Sheriff Office (WCSO) Deputy were dispatched to a ranch located near the intersection of Hernandez and Las Pilas Roads in Webb County, Texas for a report of stolen firearms. The Deputy spoke to Jose Gerardo AMARO Jr. (hereinafter AMARO) who had reported approximately ten AK-47 type rifles and twenty AR-15 type rifles stolen from a travel trailer inside a ranch belonging to JESUS GUADALUPE COVARRUBIAS (COVARRUBIAS).

On or about August 4, 2021 a WCSO Investigator contacted the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) to assist with the investigation.

On August 25, 2021, during post-Miranda interview, AMARO admitted to AFT agents that he had purchased the below listed firearms for COVARRUBIAS from a Federal Firearms Licensee in Laredo, Texas using a credit card that had been provided by COVARRUBIAS under AMARO’s name to make firearm purchases:

- SIG SAUER, M400 Snakebite, 5.56 NATO rifle, bearing serial number 20L129963(hereinafter SIG SAUER), purchased on 07/23/2021.
- ZRODELTA, Range Ready, .223 caliber rifle, bearing serial number ZAR04218, purchased on 07/26/2021.
- OCCAM DEFENSE, ODS-1775, 7.62x39 millimeter rifle, bearing serial number OD-00069, hereinafter OCCAM DEFENSE), purchased on 07/29/2021.

On August 25, 2021, ATF agents with the assistance of local law enforcement agents conducting surveillance at the residence of COVARRUBIAS on the 11000 block of Sierra Gorda Drive, in Laredo, Texas (hereinafter SIERRA GORDA), observed COVARRUBIAS, ROBERTO CARLOS ZAMORA (ZAMORA), FELIPE JESUS MELENDEZ-BRAVO (MELENDEZ), ALEJANDRO SANCHEZ (SANCHEZ) and AMARO converge at the residence, move in and out of the house and garage. AMARO drove a white pickup truck to another residence on the 1100 block of Quail Hollow Loop (hereinafter QUAIL HOLLOW), followed by COVARRUBIAS and ZAMORA. AMARO removed the three rifles (identified

above as the SIG SAUER, ZRODELTA, and OCCAM DEFENSE) from the white pickup truck and placed them inside a safe located inside the garage. ATF agents detained COVARRUBIAS, AMARO, and ZAMORA for questioning.

ATF agents interviewed COVARRUBIAS at the ATF Laredo Field Office. After advisement of rights and waiver, COVARRUBIAS admitted knowing that he is a previously convicted felon and knowing that he is prohibited from possessing firearms. COVARRUBIAS also admitted to possessing three rifles identified as the SIG SAUER, ZRODELTA, and OCCAM DEFENSE. COVARRUBIAS told agents that on August 25, 2021, he removed the three rifles from his bedroom closet at SIERRA GORDA and gave the rifles to AMARO before they were transported to QUAIL HOLLOW. COVARRUBIAS further admitted to receiving the three rifles from AMARO a week earlier and placing the three into his bedroom closet.

ATF agents interviewed SANCHEZ at the ATF Laredo Field Office. After advisement of rights and waiver, SANCHEZ admitted that on August 25, 2021, COVARRUBIAS removed a Glock, Model 43, 9-millimeter pistol bearing serial number ADXB573, with a magazine loaded live 9-millimeter ammunition and an additional spare magazine also loaded with live 9-millimeter ammunition, which ATF agents had found in the backseat that SANCHEZ had been driving when arrested on the same date.

Preliminary examination of the SIG SAUER, ZRODELTA, and OCCAM DEFENSE rifles, and the Glock 9-millimeter pistol determined that they were all were manufactured outside the state of Texas and therefore affecting interstate commerce.

In addition to a criminal complaint being filed on this defendant, complaints have been contemporaneously filed for the following defendants on violations of Title 18, Section 922:

Jose Gerardo Amaro

Roberto Carlos Zamora

Alejandro Rene Sanchez

Felipe Jesus Melendez-Bravo